

RECEIVED

MAR 17 1995

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket No. 94-102  
to ensure compatibility with )  
enhanced 911 emergency calling systems )

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF AMERITECH

Ameritech respectfully submits these Reply Comments in the above-captioned matter in answer to four specific issues raised by various parties who filed Comments on January 9, 1995.

I. THE REALITY OF LOCAL EXCHANGE COMPETITION

In response to the Commission's request for public comment on the factors affecting the implementation of local exchange services to support E911 deployment requirements<sup>1</sup>, several parties noted that the recent emergence of local exchange competition should be considered in the current effort to ensure the timely availability of E911 services to the public.<sup>2</sup> This practically "goes without saying," as the breadth and depth of this competition is widely known and daily documented.

---

<sup>1</sup> In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Notice of Proposed Rule Making ("NPRM"), released October 19, 1994, at 15 (¶29).

<sup>2</sup> Joint Comments of APCO, NENA and NASNOOA, at 24-7; Comments of Redcom Laboratories, Inc., at 5.

No. of Copies rec'd  
List ABCDE

249

Petitions for local exchange certification have been granted by or are pending before state utility commissions across the nation,<sup>3</sup> and legislation proposing full and open local exchange competition is currently pending in various states. It is perhaps a signpost along the information superhighway that several industry newsletters are now dedicated solely to reporting the ever-accelerating growth rate of local exchange competition. Ameritech supports the full recognition of local exchange competition in the Commission's current planning efforts for E911 compatibility and fully expects all providers of local exchange services to provide consistent E911 functionality.<sup>4</sup>

## II. THE ROLE OF INDUSTRY STANDARDS BODIES

Ameritech agrees with the broad cross-section of commenting parties who advocate continued effort in the industry forums already dealing with the myriad of complex technical issues inherent in this matter.<sup>5</sup> To force-fit technical solutions to wireless E911's problems in this early stage of ALI's development could cause the deployment of less desirable technologies on an interim basis, resulting in short-term "throwaway" technologies which meet schedules at the cost of serious economic inefficiency.<sup>6</sup> Ameritech supports and participates in

---

<sup>3</sup> As has been widely reported in the press, local exchange certification has been granted or requested in several states within the geographic region served by Ameritech's local exchange affiliates. Applicants to date include the local exchange subsidiaries of MCI, Time Warner, MFS, Teleport, and US Signal.

<sup>4</sup> Although MCI proudly states that it has requested or received certification as a local exchange carrier in eleven states, it predictably argues for both special treatment (designing a new responsibility-free class of carrier, which it calls a "competitive local exchange service provider," or "CLESP") and delay (in the form of an ambiguous future proceeding to be initiated by the Commission); Comments of MCI, at 2-3.

<sup>5</sup> See, e.g., Comments of Alltel, at 5-6; Comments of BellSouth, at 4-5; Comments of Interagency Committee of Search And Rescue, at 5; Comments of International Communications Association, at 3; Comments of Nextel, at 7; Comments of OPASTCO, at 7; Comments of PCIA, at 3-4; Comments of US West, at 2-9.

<sup>6</sup> Comments of BellSouth, at 11-13.

the standards process and feels any technology for E911 must follow the industry accepted process prior to any deployment.

Similarly, mandatory federal standards for PBX and Centrex compliance would override the bona fide efforts of the industry to develop workable solutions to E911 compatibility problems. For example, implementing the suggestion that the Commission mandate E911 access from PBXs without dialing a leading digit "9"<sup>7</sup> would create known significant user training problems. Real-world trials of this approach have repeatedly shown that severe caller confusion and timing problems are a certain result; PBX and Centrex users simply expect to dial a leading "9" before placing an outside call.<sup>8</sup>

Likewise, industry experience has shown that the concept of a mandatory rule that North American Numbering Plan ("NANP")-based telephone numbers must be assigned to uniquely identify all PBX station numbers<sup>9</sup> would make little real-world sense. Given the pace at which both telephone numbers and NPA's are being exhausted by current growth rates across the breadth of the telecommunications industry, as well as the advent of number portability which -- by its very nature and design -- removes the geographic meaning of the telephone number itself, such a mandate would be simply pointless.

### III. APPLICABILITY OF THE RULES TO ALL CMRS PROVIDERS

Several commenting parties urge the Commission to carve out special-interest exclusions from the rules, for the specific two-way communications services which they themselves provide. Despite Congress' mandate in the Budget Act of 1993, to regulate Commercial Mobile Radio Services in a manner which will

---

<sup>7</sup> Comments of APCO/NENA/NASNA, at 4, 17-18.

<sup>8</sup> See, e.g., Comments of Tracer, at 9.

<sup>9</sup> Comments of APCO/NENA/NASNA, at 21.

## V. CONCLUSION

For the foregoing reasons, the Commission should implement its E911 compatibility rules in the manner described. This course will ensure the timely availability of advanced E911 capabilities to the public at large, and in the optimal manner for all concerned.

Respectfully submitted,

A handwritten signature in cursive script, reading "Frank Panek/tra".

Frank Michael Panek  
Attorney for Ameritech  
Room 4H84  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025  
Telephone: (708) 248-6064

Dated: March 17, 1995

bring "all mobile service providers under a comprehensive, consistent regulatory framework"<sup>10</sup>, special exemptions are sought in the Comments for satellite-based services<sup>11</sup>, "local" two-way radio services<sup>12</sup>, two-way dispatch SMR operators<sup>13</sup>, Personal Digital Assistants<sup>14</sup>, and SMR services in general<sup>15</sup>. These unsupported, transparent attempts to competitively favor the commenting parties' own offerings in the wireless services marketplace should be rejected outright by the Commission.

#### IV. THE INFANT STAGE OF ALI TECHNOLOGY

The parties are nearly unanimous in noting that the current stage of automatic location identification ("ALI") technology does not permit the imposition of meaningful long-term deadlines for deployment, nor even for standards of accuracy.<sup>16</sup> In this area as well as those discussed above, an industry-driven standards process, with its attendant benefits of hands-on experience and negotiation among the parties directly involved in implementation, offers the only workable means to determine the appropriate future course of development for these important capabilities.

---

<sup>10</sup> In the Matter of Implementation of Sections 3(n) and 332 of the Communications Act - Regulatory Treatment of Mobile Service, GN Docket No. 93-252, Second Report and Order (released March 7, 1994), at 7 (¶ 12).

<sup>11</sup> Comments of AMSC Subsidiary Corp., at 7 (compliance would be "too costly to be justified"); Comments of Constellation Communications, Inc. (compliance "would create significant hardships by adding cost and complexity"); Comments of TRW Inc., at 2-3 (compliance is "likely to be unduly costly").

<sup>12</sup> Comments of E.F. Johnson Co., at 5-6.

<sup>13</sup> Comments of GEOTEK Communications, Inc., at 2-3.

<sup>14</sup> Comments of Motorola, Inc., at 6.

<sup>15</sup> Comments of Nextel, at 4 (rules should cover only those services provided to "users of the PSTN").

<sup>16</sup> See, e.g., Comments of Alltel, at 3; Comments of AT&T, at 32-3; Comments of Bell Atlantic, at 9-11; Comments of BellSouth, at 11-13; Comments of CTIA, at 6-7; Comments of Elert and Associates, at 2-4; Comments of Ericsson, at 6-9; Comments of GTE, at 20-24; Comments of Motorola, at 14-16.

CERTIFICATE OF SERVICE

I, Deborah L. Thrower do hereby certify that a copy of the foregoing  
REPLY COMMENTS OF AMERITECH has been served on the parties listed on  
the attached service list, by first class mail, postage prepaid, on this 17th day of  
March 1995.

By: Deborah L. Thrower  
Deborah L. Thrower

William P. Adler  
Steven N. Teplitz  
Attorneys for  
The Associated Group, Inc.  
Fleischman and Walsh, L.L.P.  
1400 Sixteenth Street, N.W.  
Washington, DC 20036

Robert M. Gurss  
Counsel for APCO  
Wilkes, Artis, Hedrick & Lane, Chrt'd.  
1666 K Street, N.W., #1100  
Washington, DC 20006

James R. Hobson  
Counsel for NENA  
Donelan, Cleary, Wood & Maser, P.C.  
1100 New York Avenue, N.W., #750  
Washington, DC 20005

Joseph P. Blaschka, Jr., PE  
14631 128th Avenue, N.E.  
Woodinville, WA 98072

Mr. Stephen H. Sachs  
Attorney General  
Offices of the Attorney General  
Munsey Building  
Calvert and Fayette Streets  
Baltimore, MD 21202-1918

Elizabeth R. Sachs, Esq.  
Counsel for American Mobile  
Telecommunications Association, Inc.  
1150 18th Street, N.W., Suite 250  
Washington, DC 20036

Bruce D. Jacobs  
Glenn S. Richards  
Attorneys for  
AMSC Subsidiary Corporation  
Fisher Wayland Cooper Leader & Zaragoza  
L.L.P.  
2001 Pennsylvania Ave., N.W., Suite 400  
Washington, DC 20006

Jonathan D. Blake  
Kurt A. Wimmer  
Attorneys for American Personal  
Communications  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
Post Office Box 7566  
Washington, DC 20044

Michael L. King, Chief of Police  
Anacortes Police Department  
1011-12th Street  
Anacortes, WA 98221

Glenn S. Rabin  
Federal Regulatory Counsel  
655 15th Street, N.W.  
Suite 220  
Washington, DC 20005

Daniel J. Aycock, Captain  
Walla Walla Police Department  
15 N. Third Street  
Walla Walla, WA 99362

Betsy L. Anderson  
Attorney for Bell Atlantic  
1320 N. Court House Road, 8th Floor  
Arlington, VA 20006

William B. Barfield  
Jim O Lewellyn  
Attorneys for Bell South Corporation, Bell  
South Telecommunications, Inc., Bell South  
Enterprises, Inc., Bell South Cellular Corp.  
1155 Peachtree Street, N.E.  
Atlanta, GA 30309-3610

David Crowe  
President  
Cellular Networking Perspectives, Ltd.  
2636 Toronto Crescent, N.W.  
Calgary, Alberta T2N3W1  
Canada

Russell A. Hoskins  
Executive Director  
Carter County Emergency  
Communications District  
P.O. Box 999  
Elizabethton, TN 37643

James S. Blaszak  
Ellen G. Block  
Counsel for the Ad Hoc Telecommunications  
Users Committee, the California Bankers  
Clearing House and the New York Clearing  
House Association  
LEVINE, BLASZAK, BLOCK & BOOTHBY  
1300 Connecticut Avenue, N.W., Suite 500  
Washington, DC 20036

S. Mark Tuller  
Attorney for Bell Atlantic Mobile  
180 Washington Valley Road  
Bedminster, NJ 07921

G. Kevin Carruth  
Deputy Director  
Planning and Construction Division  
Department of Corrections  
P.O. Box 942883  
Sacramento, CA 94283-0001

Michael F. Altschul  
Vice President, General Counsel  
Cellular Telecommunications Industry  
Association  
1250 Connecticut, N.W., Suite 200  
Washington, DC 20036

Gary O'Malley  
Vice President  
Cable Plus  
11400 SE 6th Street, Suite 120  
Bellevue, VA 98004



Jim Conran  
Founder of Consumers First  
P.O. Box 2346  
Orinda, CA 94563

Alicia A. McGlinchey  
Attorney for  
COMSAT Mobile Communications  
22300 COMSAT Drive  
Clarksburg, MD 20871

Thomas Gutierrez  
Attorney for CMT Partners  
Lukas, McGowan, Nace & Gutierrez,  
Chartered  
Suite 1200  
1111 Nineteenth Street, N.W.  
Washington, DC 20036

Adam A. Anderson  
Senior Counsel  
CMT Partners  
651 Gateway Blvd., 15th Floor  
South San Francisco, CA 94080

Robert A. Mazur  
Counsel to Constellation Communications, Inc.  
Rosenman & Colin  
Suite 200, 1300 19th St., N.W.  
Washington, DC 20036

Richard L. Bullock, Director  
Cowlitz County  
Technical Services Division  
911 Communications Division  
312 S.W. First Avenue  
Kelso, WA 98626-1724

Martha Carter, 911 Administrator  
Caddo Parish Communications District  
Number One  
1144 Texas Avenue  
Shreveport, LA 71101

Clement J. Driscoll  
C.J. Driscoll & Associates  
2066 Dorado Drive  
Rancho Palos Verdes, CA 90275

David C. Jatlow  
Attorney for The Ericsson Corporation  
Young & Jatlow  
Suite 600  
2300 N Street, N.W.  
Washington, DC 20037

Andre J Lachance  
David J. Gudino  
Attorneys for GTE Service Corporation on  
behalf of its telephone and wireless companies  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036

James M. Dye  
President, Georgia Chapter, A.P.C.O.  
140 N. Marietta Pkwy.  
Marietta, GA 30060

Laverne Hogan, Executive Director  
Greater Harris County 911 Emergency  
Network  
602 Sawyer, Suite 710  
Houston, TX 77007

Susan H.R. Jones  
Attorney for  
Geotek Communications, Inc.  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900, East Tower  
Washington, DC 20005

Danny E. Adams  
  
Attorneys for GE Capital-ResCom  
Wiley, Rein, & Fielding  
1776 K Street, N.W.  
Washington, DC 20006

Pete Luttrell, Director  
Greene County Emergency Communications  
District  
111 Union Street  
Greenville, TN 37743

B.J. Smith, Director  
911 Emergency Telephone Operations  
Hillsborough County  
P.O. Box 1110  
Tampa, FL 33601

R. Daniel Foley  
Manager  
Computer - Telephony Integration  
Harris Digital Telephone Systems  
Harris Corporation  
300 Bel Marin Keys Blvd.  
Novato, CA 94948-1188

Brian R. Moir  
Attorney for International Communications  
Association  
Moir & Hardman  
2000 L Street, N.W.  
Suite 512  
Washington, DC 20036-4907

Richard S. Whitt  
Regulatory Counsel  
IDB Mobile Communications, Inc.  
15245 Shady Grove Road  
Suite 460  
Rockville, MD 20850

John F. Tharp  
Executive Vice President  
The Illinois Telephone Association  
300 E. Monroe St.  
Springfield, IL 62705

Patricia M. Balduf  
President  
Jackson County Emergency Communications  
District  
600 Convent Ave.  
Pascagoula, MS 39567

Captain John W. Beard  
Commander King County Police Comm.  
President, Northwest Chapter APCO  
King County Department of Public Safety  
Communications Section  
516 Third Avenue  
Seattle, Washington 98104-2312

Charles Hinkle, Jr.  
KSI, Inc.  
7630 Little River Turnpike  
Suite 212  
Annandale, VA 22003

Jack Y. Sharp, President  
Kentucky Emergency Number Assoc.  
1240 Airport Road  
Frankfort, Kentucky 40601

Thomas H. Bugbee  
Bruce Malt  
COUNTY OF LOS ANGELES  
Regulatory Affairs  
Telecommunications Branch  
Information Technology Services  
P.O. Box 2231  
Downey, CA 90242

Gregory F. Intoccia  
Donald J. Elardo  
Attorneys for  
MCI Telecommunications Corp.  
1801 Pennsylvania Ave., N.W.  
Washington, DC 20006

David L. Nace  
Marci E. Greenstein  
Attorneys for  
LIBERTY CELLULAR, INC.  
Lukas, McGowan, Nace & Gutierrez,  
Chartered  
1111 19th St., N.W., 12th Floor  
Washington, DC 20036

Robert A. Mazer  
Attorney for  
Leo One USA Corporation  
Rosenman & Colin  
1300 19th St., N.W.  
Ste. 200  
Washington, DC 20036

Michael D. Kennedy  
Michael A. Menius  
Motorola, Inc.  
1350 I St., N.W.  
Ste. 400  
Washington, DC 20005

Robert L. Williams, Jr., Director  
City of Marietta  
Emergency Communications  
112 Haynes St., Ste. 911  
Marietta, GA 30060

Gregory Intoccia  
Donald J. Elardo  
Attorneys for  
MCI Telecommunications Corp.  
1801 Pennsylvania Ave., N.W.  
Washington, DC 20006

Larry A. Blosser  
Donald J. Elardo  
Attorneys for  
MCI Telecommunications Corp.  
1801 Pennsylvania Ave., N.W.  
Washington, DC 20006

Edward R. Wholl  
Jacqueline E. Holmes Nethersole  
Attorneys for  
The NYNEX Companies  
120 Bloomingdale Rd.  
White Plains, NY 10605

Lyle V. Gallagher  
Emergency Services Communication System  
Advisory Committee  
P.O. Box 5511  
Bismarck, ND 58502-5511

Albert H. Kramer  
Robert F. Aldrich  
Attorneys for the North American  
Telecommunications Association  
Keck, Mahin & Cate  
1201 New York Ave., N.W.  
Penthouse Suite  
Washington, DC 20005-3919

Paul Rodgers  
Charles D. Gray  
James Bradford Ramsay  
Attorneys for  
National Association of Regulatory  
Utility Commissioners  
1102 ICC Building  
P.O. Box 684  
Washington, DC 20044

Robert S. Foosaner, Senior Vice President  
Nextel Communications, Inc.  
800 Connecticut Ave., N.W.  
Ste. 1001  
Washington, DC 20006

Stephen L. Goodman  
Attorney for  
Northern Telecom, Inc.  
Halprin, Temple & Goodman  
1100 New York Ave, N.W.  
Ste. 650, East  
Washington, DC 20005

John Cusack, Executive Director  
National Cellular Safe Talk Center  
385 Airport Rd., Ste. A  
Elgin, IL 60123

John Schroeder, Florida Chapter President  
National Emergency Number Association  
Pasco County Emergency Communications  
8744 Government Dr.  
New Port Richey, FL 34654

Roy D. Meredith, Past President  
National Emergency Number Association  
North Carolina Chapter  
P.O. Box 429  
High Point, NC 27261-0429

Zach D. Taylor, Executive Director  
The 9-1-1 Association of Central Oklahoma  
Governments  
6 Broadway Executive Park  
6600 North Harvey Pl., Ste. 200  
Oklahoma, OK 73116-7913

Lisa M. Zaina  
Attorney for  
OPASTCO  
21 Dupont Circle, N.W.  
Ste. 700  
Washington, DC 20036

David C. Yandell, Section Director  
Technology & Operations Section  
595 Cottage St. N.E.  
Salem, OR 97310

Stephen L. Goodman  
Attorney for  
Halprin, Temple & Goodman  
1100 New York Ave, N.W., Ste. 650 East Tower  
Washington, DC 20005

Betsy Stover Granger  
Attorney for Pacific Bell  
140 New Montgomery St., Rm. 1525  
San Francisco, CA 94105

O. C. Lee, Vice President  
Proctor & Associates  
15050 Northeast 36th  
Redmond, WA 98052-5317

Gina Harrison, Director  
1275 Pennsylvania Ave., N.W.  
Ste. 400  
Washington, DC 20004

Mark J. Golden,  
Vice President of Industry Affairs  
  
1019 19th St., N.W.  
Ste. 1100  
Washington, DC 20036

Phillip Sailer  
Pro West & Associates  
P.O. Box 812  
Hwy. 371 North  
Walker, MN 56484

Ellen S. Levine  
Attorneys for the People of the State of  
California and the Public Utilities Commission  
of the State of California  
505 Van Ness Ave.  
San Francisco, CA 94102

David L. Jones, Chairman  
Rural Cellular Association  
2120 L St., N.W., Ste. 520  
Washington, DC 20037

Jerome S. Caplan, Director  
Redcom Laboratories, Inc.  
1 Redcom Center  
Victor, NY 14564-0995

Jean L. Kiddoo  
Shelley L. Spencer  
Attorneys for  
Springwich Cellular Limited Partnership  
Swindler & Berlin, Chtd.  
3000 K St., N.W.  
Ste. 300  
Washington, DC 20007

James D. Ellis  
Mary Marks  
Attorneys for SBC Communications, Inc.  
175 W. Houston, Ste. 1306  
San Antonio, TX 78205

Wayne Watts  
Bruce E. Beard  
Attorneys for Southwestern Bell Mobile  
Systems, Inc.  
17330 Preston Rd., Ste. 100A  
Dallas, TX 75252

Paul R. Schwedler  
Carl W. Smith  
Attorneys for  
Telecommunications, DOD  
Defense Information Systems Agency  
Code DO1  
701 S. Courthouse Rd.  
Arlington, VA 22204

David L. Zeretzke, Director  
San Juan County  
350 Court St. #5  
Friday Harbor, WA 98250

Stephen D. Baruch  
Raul R. Rodriguez  
Attorneys for  
Leventhal, Senter & Lerman  
2000 K St. N.W.,  
Ste. 600  
Washington, DC 20006

George N. Rover, Deputy Attorney General  
Hughes Justice Complex  
CN 080  
Trenton, NJ 08625-0800

Scott Wollaton, Esq. Vice President  
Siemens Rolm Communications Inc.  
4900 Old Ironsides Dr., M/S 103  
P.O. Box 58075  
Santa Clara, CA 95052-8075

Herman A. Bustamante, Technical Director  
Stanford Telecommunications, Inc.  
1221 Crossman Ave.  
Sunnyvale, CA 94089-1117

Scott A. Sawyer, Assistant Attorney General  
Office of the Attorney General  
P.O. Box 12548  
Austin, TX 78711-2548

James C. Quackenbush, Director  
Thuston County Department of  
Communications  
2000 Lakeridge Dr. S.W.  
Olympia, WA 98502

Scott A. Sawyer, Assistant Attorney General  
Consumer Protection Division Public Agency  
Representation Section  
P.O. Box 12548  
Capitol Station  
Austin, TX 78711-2548

Jefferey S. Linder  
R. Michael Senkowski  
Attorneys for  
Tele-Communications Association  
Wiley, Rein & Fielding  
1776 K St., N.W.  
Washington, DC 20006

David S. Keir  
Norman P. Leventhal  
Attorneys for  
TRW, Inc.  
Leventhal, Senter & Lerman  
2000 K St., N.W., Ste. 600  
Washington, DC 20006

David Kelley  
Terrapin Corporation  
11958 Monarch St.  
Garden Grove, CA 92641

Alfred Sonnenstrahl, Executive Director  
Telecommunications for the Deaf, Inc.  
8719 Colesville Rd.  
Ste. 300  
Silver Spring, MD 20910

Dan Bart, Vice President  
Telecommunications Industry  
2500 Wilson Boulevard, Ste. 300  
Arlington, VA 22201

J. D. Hersey, Jr.  
U.S. Department of Transportation  
United States Coast Guard  
Commandant (G-TTM)  
2100 Second St., S.W.  
Washington, DC 20593-0001

Jeffery S. Bork  
Attorney for  
U S WEST, Inc.  
1020 19th St., N.W.  
Ste. 700  
Washington, DC 20036

Peter M. Connolly  
Attorney for United States Cellular  
Corporation  
Koteen & Naftalin  
1150 Connecticut Ave., N.W.  
Washington, DC 20036

Jeffrey L. Sheldon  
Thomas E. Goode  
Attorneys for UTC  
1140 Connecticut Ave., N.W.  
Ste. 1140  
Washington, DC 20036

Robert G. Oenning  
1417 6th Ave., S.E.  
P.O. Box 48346  
Olympia, WA 98504-8346

Naomi L. Wu, Communications Manager  
Port Angeles Police Department  
321 East 5th St.  
Port Angeles, WA 98362

Arthur A. Butler  
Attorney for  
Washington TRACER and Oregon TRACER  
Ater, Wynne, Hewitt, Dodson & Skerritt  
601 Union St., Ste. 5450  
Seattle, WA 98101-2327

James Carlsen  
Attorney for  
Westinghouse Electric Corporation  
Electronic Systems Group  
P.O. Box 746 - MS A475  
Baltimore, MD 21203

Martin W. Bercovici  
Waterway Communications System, Inc.  
Keller and Heckman  
1001 G St., N.W.  
Ste. 500W  
Washington, DC 2001-4545

Michael J. Miller  
Teledent, Inc.  
4510 West 77th Street  
Suite 101  
Minneapolis, MN 55435